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Plaintiffs' counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE PACIFIC FERTILITY CENTER
LITIGATION

This Document Relates to:
No. 3:18-cv-01586
(A.B., C.D., E.F., G.H., and I.J.)

Master Case No. 3:18-cv-01586-JSC

**DECLARATION OF AMY M. ZEMAN
IN SUPPORT OF PLAINTIFFS' REPLY
RE MOTION TO EXCLUDE EXPERT
TESTIMONY**

Date: March 4, 2021
Time: 9:00 a.m.
Judge: Hon. Jacqueline S. Corley
Place: Courtroom F, 15th Floor

1 1. I am a partner at the law firm Gibbs Law Group LLP, counsel for Plaintiffs in the above-
2 captioned action, and submit this declaration in support of Plaintiffs' reply regarding their motion to
3 exclude expert testimony.

4 2. Attached as **Exhibit 1** is are excerpts from the deposition of Keith Gustafson taken on
5 February 6, 2020.

6 3. Attached as **Exhibit 2** is an excerpt of the Reflections metadata produced by Pacific
7 MSO in native format with bates number MSO026866. The excerpt shows four lines of data and omits
8 other line items.

9
10 Dated: February 12, 2021

Respectfully submitted,

11 By: /s/ Amy M. Zeman

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